



STATE OF NEW YORK  
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June 1, 2022

*By ECF*

Honorable Victor Marrero  
United States District Court  
Southern District of New York

**Re: *National Coalition on Black Civic Participation v. Jacob Wohl,*  
SDNY Case No. 20 Civ. 8668 (VM)(OTW)**

Dear Judge Marrero:

On behalf of all Plaintiffs and Defendants Robert Mahanian and Message Communications, Plaintiff-Intervenor the People of the State of New York hereby respectfully submits for so-ordering a fully executed proposed Consent Decree, settling the claims against Robert Mahanian and Message Communications only.<sup>1</sup>

The parties are prepared to respond to any questions or concerns the Court may have.

Respectfully,

/s/ Rick Sawyer

Rick Sawyer  
Special Counsel  
New York State  
Office of the Attorney General

Encl.

cc: All counsel of record (via ECF)

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<sup>1</sup> The Court's May 9, 2022 Order of Conditional Discontinuance mentions only Defendant Message Communications. See D.E. 194. The parties respectfully clarify that the attached consent Decree covers claims against *both* Message Communications and Robert Mahanian.